

Name and address:

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

United States of America	Plaintiff(s),	CASE NUMBER 2:25-cv-06230-MCS-AGR
v.		
The State of California, et al.	Defendant(s),	APPLICATION OF NON-RESIDENT ATTORNEY TO APPEAR IN A SPECIFIC CASE PRO HAC VICE

**INSTRUCTIONS FOR APPLICANTS**

- (1) The attorney seeking to appear pro hac vice must complete Section I of this Application, the certification in Section II, and have the designated Local Counsel sign in Section III. Space to supplement responses is provided in Section IV. The applicant must also attach a Certificate of Good Standing (issued within the last 30 days) from every state bar to which he or she is admitted; failure to do so will be grounds for denying the Application. Scan the completed Application, together with any attachment(s), to a single Portable Document Format (PDF) file.
- (2) Have the designated Local Counsel file the Application electronically using the Court's electronic filing system ("Motions and Related Filings => Applications/Ex Parte Applications/Motions/Petitions/Requests => Appear Pro Hac Vice (G-64)"), attach a Proposed Order (using Form G-64 ORDER, available from the Court's website), and pay the required \$500 fee online at the time of filing (using a credit card). The fee is required for each case in which the applicant files an Application. Failure to pay the fee at the time of filing will be grounds for denying the Application. **Out-of-state federal government attorneys are not required to pay the \$500 fee.** (Certain attorneys for the United States are also exempt from the requirement of applying for pro hac vice status. See L.R. 83-2.1.4.) A copy of the G-64 ORDER in Word or WordPerfect format must be emailed to the generic chambers email address. L.R. 5-4.4.2.

**SECTION I - INFORMATION**

Saunders, Thomas G.

Applicant's Name (Last Name, First Name & Middle Initial)

check here if federal government attorney ☐

Wilmer Cutler Pickering Hale and Dorr LLP

Firm/Agency Name

2100 Pennsylvania Avenue, NW

202-663-6536

202-663-6363

Telephone Number

Fax Number

Street Address

Washington, DC 20037

thomas.saunders@wilmerhale.com

City, State, Zip Code

E-mail Address

**I have been retained to represent the following parties:**

Association of California Egg Farmers

☐ Plaintiff(s) ☐ Defendant(s) ☒ Other: Defendant-Intervenor

☐ Plaintiff(s) ☐ Defendant(s) ☐ Other:

Name(s) of Party(ies) Represented

List all state and federal courts (including appellate courts) to which the applicant has been admitted, and provide the current status of his or her membership. Use Section IV if more room is needed, or to provide additional information.

Name of Court	Date of Admission	Active Member in Good Standing? (if not, please explain)
New York, First Judicial Division	7/11/2006	Yes
D.C. Court of Appeals	2/9/2007	Yes
U.S. Ct. of Appeals for the Federal Circuit	9/12/2006	Yes

#1202

List all cases in which the applicant has applied to this Court for *pro hac vice* status in the previous three years (continue in Section IV if needed):

<u>Case Number</u>	<u>Title of Action</u>	<u>Date of Application</u>	<u>Granted / Denied?</u>
2:22-cv-07556-RGK	GoTV Streaming, LLC v. Netflix, Inc.	10/11/2023	Granted

If any *pro hac vice* applications submitted within the past three (3) years have been denied by the Court, please explain:

*Attorneys must be registered for the Court's electronic filing system to practice pro hac vice in this Court. Submission of this Application will constitute your registration (or re-registration) to use that system. If the Court signs an Order granting your Application, visit [www.pacer.gov](http://www.pacer.gov) to complete the registration process and activate your e-filing privileges in the Central District of California.*

## **SECTION II - CERTIFICATION**

I declare under penalty of perjury that:

- (1) All of the above information is true and correct.
- (2) I am not a resident of the State of California. I am not regularly employed in, or engaged in substantial business, professional, or other activities in the State of California.
- (3) I am not currently suspended from and have never been disbarred from practice in any court.
- (4) I am familiar with the Court's Local Civil and Criminal Rules, the Federal Rules of Civil and Criminal Procedure, and the Federal Rules of Evidence.
- (5) I designate the attorney listed in Section III below, who is a member in good standing of the Bar of this Court and maintains an office in the Central District of California for the practice of law, in which the attorney is physically present on a regular basis to conduct business, as local counsel pursuant to Local Rule 83-2.1.3.4.

Dated October 10, 2025

Thomas G. Saunders

*Applicant's Name (please type or print)*



*Applicant's Signature*

**SECTION III - DESIGNATION OF LOCAL COUNSEL**

Fugere, Leah M.

*Designee's Name (Last Name, First Name & Middle Initial)*

Wilmer Cutler Pickering Hale and Dorr LLC

*Firm/Agency Name*

350 South Grand Avenue, Suite 2400

*Street Address*

Los Angeles, CA 90071

*City, State, Zip Code*

213-443-5336

*Telephone Number*

202-663-6363

*Fax Number*

leah.fugere@wilmerhale.com

*Email Address*

354757

*Designee's California State Bar Number*

**I hereby consent to the foregoing designation as local counsel, and declare under penalty of perjury that I maintain an office in the Central District of California for the practice of law, in which I am physically present on a regular basis to conduct business.**

Dated October 10, 2025

Leah M. Fugere

*Designee's Name (please type or print)*

/s/ Leah M Fugere

*Designee's Signature*

**SECTION IV - SUPPLEMENT ANSWERS HERE (ATTACH ADDITIONAL PAGES IF NECESSARY)**

Continuation of Bar Admissions (all as an active member in good standing):

U.S. Court of Appeals for the Second Circuit: 6/29/2009

U.S. Court of Appeals for the Tenth Circuit: 9/25/2009

U.S. Court of Appeals for the Ninth Circuit: 6/10/2011

U.S. Supreme Court: 11/18/2013

U.S. District Court for the District of Columbia: 5/5/2014

U.S. Court of Appeals for the Eleventh Circuit: 12/1/2015

U.S. District Court for the Eastern District of Michigan: 12/1/2015

U.S. Court of Appeals for the D.C. Circuit: 5/2/2016

U.S. District Court for the Western District of Michigan: 1/5/2017

U.S. Court of Appeals for the Sixth Circuit: 4/24/2019

U.S. Court of Appeals for the First Circuit: 4/27/2021

U.S. Court of Appeals for the Third Circuit: 5/15/2022

U.S. Court of Federal Claims: 1/8/2024

\*As reflected in the signature block of certain filings made in this case, this application was believed to have been filed in July 2025. Counsel recently discovered, however, that it inadvertently was not submitted at that time. Counsel apologizes to the Court for this oversight and respectfully requests the Court's consideration of this application.



*Appellate Division of the Supreme Court  
of the State of New York  
First Judicial Department*

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*I, Susanna M. Rojas, Clerk of the Appellate Division of the  
Supreme Court of the State of New York, First Judicial  
Department, do hereby certify that*

*Thomas Glenn Saunders*

*was duly licensed and admitted to practice as an Attorney and  
Counselor at Law in all the courts of this State on **July 11, 2006**,  
has duly taken and subscribed the oath of office prescribed by law,  
has been enrolled in the Roll of Attorneys and Counselors at Law  
on file in this office, is duly registered with the Office of Court  
Administration, and according to the records of this Court is  
currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set  
my hand in the City of New York on  
October 8, 2025.*



*Susanna M. Rojas*

*Clerk of the Court*



*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,  
the District of Columbia Bar does hereby certify that*

## ***Thomas G Saunders***

*was duly qualified and admitted on February 9, 2007 as an attorney and counselor entitled to  
practice before this Court; and is, on the date indicated below, an Active member in good  
standing of this Bar.*

*In Testimony Whereof,  
I have hereunto subscribed my  
name and affixed the seal of this  
Court at the City of  
Washington, D.C., on October 06, 2025.*

*Julio A. Castillo*  
**JULIO A. CASTILLO**  
Clerk of the Court

Issued By:

A handwritten signature in black ink, appearing to read "David Chu".

*David Chu - Director, Membership  
District of Columbia Bar Membership*

***For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email  
memberservices@dcbar.org.***